

**STATEMENT OF BASIS (AI No. 80637)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0121983 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Eagle Dry-dock & Marine Repairs LLC  
Post Office Box 3431  
Houma, Louisiana 70361-3431

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** January 18, 2006

**1. PERMIT STATUS**

**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B.** NPDES permit - N/A  
NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

**C.** LWDPS permit - N/A  
LWDPS permit effective date:  
LWDPS permit expiration date:

**D.** Date Application Received: December 15, 2004

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - barge repair facility**

Eagle Dry-dock & Marine Repairs, LLC is an existing barge repair facility. The facility refurbishes (cuts, welds, blasts, and paints) deck barges for oilfield service fleets usually about 1 per month. These vessels provide work space for other equipment and carry no products in their holds. The facility does not accept barges with dirty, greasy tops or any bilge water. The deck barge fleet owner actually provides the paints and solvents, performs the work, and takes responsibility for any paint cleanup wastes. The facility provides the dry dock, air compressor, diesel fuel, etc. The dry dock is a floating barge that is raised and lowered by moving ambient water from the Intracoastal Waterway in and out of compartments by the way of submersible electric pumps. Once the barges are raised, repairs are done. These repairs can include blasting the hull, repainting using red zinc primer and using epoxy topcoats. There is NO barge washing (inside or outside) performed at the facility. Barges are washed prior to

arriving at the facility. Any solids that accumulate on the dry dock are periodically removed and used as a fill material on-site.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I\*
3. Wastewater Type: II
4. SIC code: 3731

\*\*The complexity for SIC code 3731 is IV; however, based on the Strategy for Complexity Designation for SIC codes 3731 and 3732, facilities discharging ballast water (dry dock ballast) shall receive a complexity of I.

**C. LOCATION** - 408 Old Bayou Dularge Road, Houma, Terrebonne Parish  
Latitude 29°33'50", Longitude 90°44'01"

**3. OUTFALL INFORMATION**

Outfall 001

Discharge Type: dry dock ballast water  
Treatment: none  
Location: at the point of discharge from the dry dock  
(Latitude 29°33'50", Longitude 90°44'01")  
Flow: 80,000 gpd  
Discharge Route: directly to the Intracoastal Waterway

Outfall 002

Discharge Type: dock washwater  
Treatment: none  
Location: at the point of discharge from the dock  
(Latitude 29°33'50", Longitude 90°44'01")  
Flow: intermittent  
Discharge Route: directly to the Intracoastal Waterway

**4. RECEIVING WATERS**

STREAM - Intracoastal Waterway

BASIN AND SEGMENT - Terrebonne Basin, Segment 120403

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply  
f. agriculture

**5. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**6. COMPLIANCE HISTORY/COMMENTS**

**A. Compliance History**

There have been no recent inspections at the facility.

**B. DMR Review/Excursions**

There are no DMR's for this facility as this application is for first time coverage.

**7. EXISTING EFFLUENT LIMITS**

N/A

**8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 120403 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

**Rationale for Eagle Dry-dock & Marine Repairs LLC**

**1. Outfall 001 - dry dock ballast water (estimated flow is 80,000 gpd)**

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	BPJ
COD	---:250	BPJ
Oil & Grease	---:15	BPJ
pH	6.0 - 9.0 s.u.	BPJ

Additional dry dock language included in Part II.

**Treatment:** none

**Monitoring Frequency:** 1/discharge event for all parameters at the point of discharge from the dry dock. Note: COD, oil & grease, and pH are only required if a visible oil sheen is present.

**Limits Justification:** BPJ based on similar facilities

**2. Outfall 002 - dock washwater (estimated flow is intermittent)**

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Visible Sheen	---:No Presence	BPJ

**Treatment:** none

**Monitoring Frequency:** 1/discharge event for visible sheen at the point of discharge from the dock

**Limits Justification:** BPJ based on similar facilities

BPJ Best Professional Judgement  
su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

As per LAC33:IX.2341.B.14.k, stormwater discharges from facilities classified as SIC Code 3731 are considered to be associated with industrial activities. Therefore, an SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).

**303(d)/TMDL WATERBODIES**

Subsegment 120403 is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO (EPA - Category 5) and pH. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the barge cleaning and repair point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, for the purposes of this permit, the organic enrichment/low DO and pH impairments will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

**organic enrichment/low DO**

To protect against the further impairment of the organic enrichment/low DO impairment cause, a COD limit has been placed on Outfall 001.

**pH**

To protect against the further impairment of the pH impairment cause, pH limits have been placed on Outfall 001.